

EXHIBIT 60

Jessica Mahoney

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| | | |
|--------------------------|---|-----------------------|
| CHARLES JOSEPH FREITAG, | : | |
| JR., as ADMINISTRATOR of | : | |
| the ESTATE OF CHARLES | : | |
| JOSEPH FREITAG, SR., | : | |
| Plaintiff | : | |
| | : | No. 2:19-cv-05750-JMG |
| VS | : | |
| | : | |
| BUCKS COUNTY; PRIMECARE | : | |
| MEDICAL, INC.; STEPHAN | : | |
| BRAUTIGAM, PMHNP; | : | |
| JESSICA MAHONEY, PSY.D; | : | |
| AVIA JAMES, LPC; | : | |
| CHRISTINA PENGE, LPC; | : | |
| JOHN DOES 1-10, | : | |
| Defendants | : | |

ZOOM DEPOSITION OF JESSICA MAHONEY

DATE AND TIME: January 29, 2021, 9:06 a.m.

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1 of my department.

2 I'm not sure if that was the case in
3 this specific case, though.

4 BY MR. FEINBERG:

5 Q. Okay. That practice that you're
6 describing, was that an established practice which
7 was -- you know, there was a written policy or was
8 that just something that developed over time?

9 A. I do not believe there is a written
10 policy --

11 Q. Okay.

12 A. -- for that.

13 Q. All right. Tell me -- I understand
14 your description. Let me try to ask more
15 generically. Okay?

16 Take Mr. Freitag out of the equation.
17 Just as a matter of practice, as you understood it
18 back in 2018, a prisoner goes to court, they
19 receive a sentence, it's a long sentence. You
20 know, it could be 10 to 20 years, 20 to 40, maybe
21 even life, right?

22 They come back to the facility after
23 court. What is the practice as you understand it?

24 A. I've never witnessed the process or
25 heard about the process, but I do know that in

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1 other instances or in certain instances, there is
2 an e-mail or a phone call placed by jail staff to
3 higher jail staff, I'm not exactly sure.

4 At certain points, they have called the
5 supervisor at home on weekends to ask opinions
6 about what should be done.

7 Q. All right. Do you know which jail
8 staff would initiate that process?

9 A. It would be one of the reception
10 officers. I don't know specifically.

11 Q. Okay. And to be clear, I'm not asking
12 about specific names of the specific person.

13 A. Sure.

14 Q. I'm talking about a rank or position.
15 And that was your answering before; is
16 that right?

17 A. Yep, an officer.

18 Q. Okay. And when you say reception
19 staff, is that someone who, when prisoners are
20 brought back to the facility, that would be the
21 first officer who processes them back into the
22 facility; is that right?

23 A. Yes.

24 Q. Okay. And to your understanding, that
25 person sends an e-mail to a supervisory level

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1 officer?

2 A. Or a phone call, yes.

3 Q. Got it, okay. And then, at some point
4 in that process, there's a decision made about what
5 level of watch should be in place; is that right?

6 A. Correct.

7 Q. Okay. You mentioned that sometimes
8 your supervisor would get looped into those
9 conversations.

10 Once again, can I assume any time you
11 mention supervisor, you're talking about Dr.
12 Cassidy?

13 A. Correct.

14 Q. Okay. So you mentioned that Dr.
15 Cassidy would be brought into those conversations.

16 Do you have any understanding as to --
17 as to the -- if there's any rules or practices
18 about what would lead to her getting brought in in
19 some cases but not brought in in other cases?

20 A. I don't.

21 Q. Essentially, to your understanding,
22 that's up to jail staff?

23 A. Correct.

24 Q. Got it. How many times have you been
25 made aware of a situation like that?

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1 A. I don't know. Prior to -- prior to
2 this?

3 Q. Yeah, okay, that's fair. Let's try to
4 break it down.

5 And by the way, I'll show it to you
6 later. To my understanding, there was an e-mail
7 chain, which appears to have complied with what
8 you're -- well, let me withdraw that.

9 There were a series of e-mails after
10 Mr. Freitag was returned to the facility. I'll
11 show you that in a little bit, and we'll see
12 whether that's consistent with your understanding.

13 Let's then look back in time. Before
14 August of 2018, how many times had you seen
15 something like that happen?

16 A. Maybe four or five times.

17 Q. Okay. And for reference, how long had
18 you been at Bucks County before that time?

19 A. Less than a year.

20 Q. Okay. Since that time, have you seen
21 e-mails or been aware of correspondence like that?

22 A. We have a new system in place where
23 everyone that receives a state sentence is placed
24 on suicide watch when they return.

25 Q. All right, okay. I'm going to come to